

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Matthew Sequin

Case: 2:18-mj-30398
Judge: Unassigned,
Filed: 07-25-2018
IN RE SEALED MATTER (BG)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 18, 2017 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. §922(g)(3)

Offense Description

Unlawful user of or addicted to any controlled substances-
possessed a firearm that had previously traveled interstate
commerce

This criminal complaint is based on these facts:

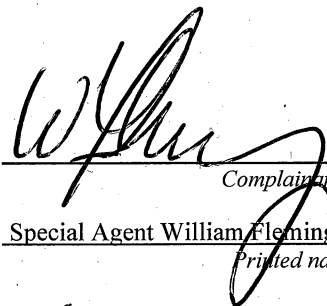
See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: JUL 25 2018

City and state: Detroit, MI



Complainant's signature

Special Agent William Fleming, FBI

Printed name and title



Judge's signature

Elizabeth Stafford, US Magistrate Judge

Printed name and title

AFFIDAVIT

I, Special Agent William R. Fleming, being duly sworn, state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI"), and am currently assigned to the Detroit Division, Macomb County Resident Agency, Clinton Township, Michigan. I have been employed as a Special Agent of the FBI for over thirty years. During this time, I have worked numerous investigations involving the possession of firearms by prohibited persons and convicted felons.

2. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, law enforcement reports that I have reviewed, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

3. This affidavit is in support of a complaint and arrest warrant for MATTHEW SEQUIN. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included

each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause to believe that MATTHEW SEQUIN violated 18 U.S.C. § 922(g)(3) (being an unlawful user of a controlled substance in possession of a firearm).

II. INVESTIGATION AND PROBABLE CAUSE

4. On September 18, 2017, United States Magistrate Judge Elizabeth Stafford signed a search warrant authorizing a search of ** Riverside Drive, Mt. Clemens, Michigan. This search was related to an ongoing FBI investigation into a violation of Title 18, United States Code, Section 1959(a) (assault in the aid of racketeering and conspiracy).

5. One of the subjects of this investigation was MATTHEW SEQUIN, who at the time of the search warrant execution was a member of the Vigilantes Motorcycle Club ("VMC").

6. Prior investigation had revealed that SEQUIN lived at ** Riverside Drive, Mt. Clemens, Michigan.

7. During the course of the search warrant, agents and officers found eight firearms, a bullet-proof vest, numerous rounds of ammunition, spent shell casings, a container that held a green leafy substance believed to be marijuana, and a pipe containing residue.

8. Based upon the training and experience of the FBI Agents searching SEQUIN'S home, the agents recognized the green leafy substance and the pipe as illegal narcotics and drug paraphernalia. Although not expressly covered in the search warrant attachment, agents seized these items because they are illegal to possess.

9. Due to the current hazards of fentanyl being mixed into various drugs, current FBI practice is to not field test any suspected illegal drugs found during the course of a search, arrest, or investigation.

10. After the completion of the search, I conducted a firearms search on NCIC/LEIN, and found that that one of the firearms seized from SEQUIN'S home—a Smith and Wesson, Model 1076 10 mm handgun—was reported stolen during a burglary of a business in Livonia, Michigan.

11. I am also aware, through training and experience, that this handgun was not manufactured in the State of Michigan.

12. I was also aware, prior to the search being conducted, that SEQUIN was convicted of Aggravated Domestic Violence in 2008 and pled Nolo Contendere, in a separate incident, to a Domestic Violence charge in 2009. Both of these convictions occurred in the 41B District Court, Clinton Township, Michigan.

13. Although not expressly covered in the search warrant attachment, agents and officers seized the firearms and ammunition found based upon my knowledge that, under Title 18, United States Code, Section 922(g)(3), it is illegal for an unlawful user of any controlled substance to be in possession of a firearm.

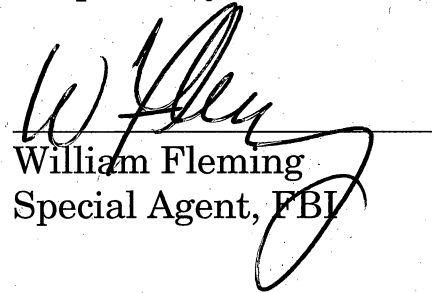
14. In November of 2017, I turned over the items previously mentioned in paragraph 8 for testing by the Drug Enforcement Administration (DEA) Laboratory in Chicago, Illinois.

15. In late June of 2018, I received a laboratory report from DEA that identified the green leafy substance as marijuana.

III. CONCLUSION

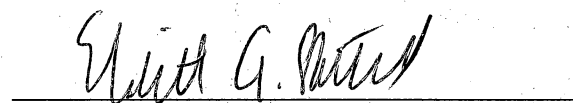
16. Based on the above investigation, probable cause exists that MATTHEW SEQUIN—a person who is an unlawful user of or addicted to any controlled substance—possessed a firearm that had previously traveled in interstate commerce, in violation of 18 U.S.C. §§ 922(g)(3) and (g)(9).

Respectfully Submitted,



William Fleming
Special Agent, FBI

Subscribed and sworn before me on July 25, 2018



Hon. Elizabeth A. Stafford
United States Magistrate Judge